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Attorneys for Plaintiff OWEN DIAZ

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

DEMETRIC DI-AZ, OWEN DIAZ, and  
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;  
CITISTAFF SOLUTIONS, INC.; WEST  
VALLEY STAFFING GROUP;  
CHARTWELL STAFFING SERVICES, INC.;  
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**DECLARATION OF CIMONE NUNLEY  
IN SUPPORT OF PLAINTIFF'S  
MOTIONS IN LIMINE  
NOS. 1-9**

1 I, CIMONE A. NUNLEY, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an attorney with  
3 the law firm of California Civil Rights Law Group, attorneys of record for Plaintiff Owen Diaz  
4 in this action. I submit this Declaration in support of Plaintiff's Motions *in Limine*. I have  
5 personal knowledge of the facts stated herein and if called upon to testify, I could and would  
6 competently testify thereto, except as to those matters that are stated upon information and belief.

7 2. Attached hereto as Exhibit 1 are true and correct excerpts from the deposition of  
8 Annalisa Heisen in this matter.

9 3. Attached hereto as Exhibit 2 is a true and correct copy of correspondence between myself  
10 and counsel for Defendant, Dan Posner, dated January 26, 2023.

11 4. Attached hereto as Exhibit 3 is a proposed demonstrative from Plaintiff's economic  
12 expert, Charles Mahla, prepared and provided to Defendant in advance of the original trial in this  
13 matter.

14 5. Attached hereto as Exhibit 4 is a true and correct copy of Trial Exhibit 139 from the  
15 original trial in this matter.

16  
17 I declare under penalty of perjury under the laws of the United States of America that the  
18 foregoing is true and correct. Executed on February 3, 2023 in San Anselmo, California.

19  
20 Dated: February 3, 2023

**CALIFORNIA CIVIL RIGHTS LAW GROUP  
ALEXANDER MORRISON + FEHR LLP  
ALTSHULER BERZON LLP**

21  
22 /s/ Cimone A. Nunley

23 Lawrence A. Organ  
24 Cimone A. Nunley  
25 J. Bernard Alexander III  
26 Michael Rubin  
27 Jonathan Rosenthal  
28 Attorneys for Plaintiff  
OWEN DIAZ